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March 8, 1991

Mr. Robert M. Nelson, Jr.
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Mr. James O. Zane
Manager
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**RE: REVIEW AND COMMENT: INTERIM PLAN FOR THE PREVENTION
OF CONTAMINANT DISPERSION (IPPCD), FEBRUARY, 1991**

Dear Messrs. Nelson and Zane,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) and the Environmental Protection Agency have reviewed the above referenced document submitted by DOE and its prime operating contractor, EG&G. While not an official IAG deliverable subject to approval, the agencies consider this an important document. It has gained importance recently when DOE requested a further delay of the Final PPCD. Therefore, we have elected to make the attached comments which represent concerns of both regulatory agencies.

The Division would like for DOE to address these comments in finalizing the IPPCD.

Sincerely,

Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

cc: Martin Hestmark, EPA
Fraser Lockhart, DOE
Scott Grace, DOE
Tom Greengard, EG&G
Dennis Smith, EG&G
Barbara Barry, RFPD

Colorado Department of Health

Review and Comment

Interim Plan for the Prevention of Contaminant Dispersion
February, 1991

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General Comments

1) Overall, the Division is pleased with the brevity and concise coverage the IPPCD gives the problem of contaminant dispersion. There is a need, however, to either reference or include all potentially applicable SOP's in this document (particularly SOP 1.1 on air monitoring, SOP's 3.2, 3.3, and 3.4 on well installation, any guidelines on heavy equipment operations, etc.) and to make sure that the IPPCD is consistent with the SOP's.

2) This plan only addresses suspended particulates and makes no mention of how the plant plans to avoid spreading contaminated soils and/or liquids into presently uncontaminated locales that may, at some point, affect off-plant populations. This issue was discussed at the February 7, 1991 staff-level meeting and it is the Division's understanding that this issue will be addressed in the Final PPCD. At least a brief mention of the applicable SOP's and proposed plan should be made in this document (i.e., SOP's 1.3, 1.4, and 1.12 on decontamination, SOP's 1.5, 1.7, and 1.8 on handling various wastes, etc.).

3) The only current guidelines for ER activities at RFP regarding dust control are found in the 881 Hillside work procedures for construction and drilling and the QAPjP for the IM/IRA at 881 Hillside. The Division believes that the IPPCD should have at least the same levels of specific requirements that are found in these documents. However, we do not find this to be the case. The construction work procedures for the 881 Hillside say that "H1-Vol air samples must be operational and checked before general construction work can continue. Samplers must be calibrated and deemed operational by the air monitoring group of Environmental Restoration. Samplers will be checked with an alpha scanner daily at the end of each day when earth moving is done. Total samples will be collected monthly." The IPPCD makes no mention of the air monitoring group in the ER section. A similar group, the Air Programs Group of the Environmental Monitoring and Assessment Division, is repeatedly referred to in the QAPjP for OU 2 as being responsible for monitoring the meteorology, air quality, H1-Vol samplers, and dust resuspension risks for each site. No mention of

this group is made in the IPPCD either. As these two groups will be responsible for the documentation of conditions that may invoke the action-levels, some description of their existence, role, and responsibilities should be included. The quote above also refers to the frequency that the Hi-Vol samplers will be checked. This checking frequency is not found in the IPPCD and SOP 1.1 has longer sampling periods. This needs to be remedied. The entire monitoring section of the IPPCD could be expanded to more completely cover this vital portion of the document. Please review other issues concerning dust and contaminant dispersion presented in the OU 2 documents and make sure that the IPPCD is in agreement or superceeds the guidelines therein.

Specific Comments

1) The IPPCD is clear and concise on the criteria that will be used to stop work. However, it is not clear what criteria will be used to resume work. Please add an explanation of the work resumption protocols.

2) In the PPCD portion of the IAC, there is a statement that says that "high wind conditions are defined as winds blowing in excess of 15 mph or where visible particulate emissions leave the respective site(s)." The last half of this statement has been omitted from this document and needs to be included.

3) This plan makes no allowances for the 35 mph windspeed that has been proposed as the shut-down speed for drilling operations. Is this by design, or was this inadvertently omitted? For reference, see SOP 1.1.